

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GENERAL MAJORITY PAC, a)
Washington, D.C., not for profit)
corporation,)

Plaintiff,)

v.)

CAROL AICHELE, in her official)
capacity as Pennsylvania Secretary of)
State; KATHLEEN KANE, in her)
official capacity as Pennsylvania)
Attorney General; JONATHAN M.)
MARKS, in his official capacity as)
Commissioner of Pennsylvania’s)
Bureau of Commissions, Elections)
and Legislation; IAN HARLOW, in)
his official capacity as Deputy)
Commissioner of Pennsylvania’s)
Bureau of Commissions, Elections)
and Legislation; and TRISHA)
MALEHORN, in her official capacity)
as Chief of the Division of Campaign)
Finance and Lobbying Disclosure of)
Pennsylvania’s Bureau of)
Commissions, Elections and)
Legislation,)

Defendants.)

Civil Action No. _____

**[PROPOSED] ORDER GRANTING
MOTION FOR PRELIMINARY
INJUNCTION**

This matter comes before the Court on the Motion for Preliminary Injunction filed by Plaintiff, GENERAL MAJORITY PAC (“GMP”). The Court, having carefully considered all of the papers filed in support of and in opposition to the Motion for Preliminary Injunction, as well as oral argument in support of

and in opposition of the same, finds that GMP has demonstrated that (1) it is likely to succeed on the merits of its claims; (2) it will suffer irreparable harm if injunctive relief is not granted; (3) Defendants will not suffer harm if relief is granted; and (4) the public interest favors the issuance of injunctive relief.

Accordingly, IT IS HEREBY ORDERED THAT:

1. GMP's Motion for a Preliminary Injunction is GRANTED.
2. Until such time as the Court makes a final ruling on the merits, or until otherwise ordered by the Court, Defendants, their respective agents, officers, employees, successors, and all persons acting in concert with each or any of them are hereby ENJOINED AND RESTRAINED from implementing, enforcing or giving any effect to 25 Pa. Stat. Ann. § 3253(a)'s prohibition on political committees accepting or receiving any contributions from corporations, unincorporated associations, or labor unions, or on corporations, unincorporated associations, or labor unions making such contributions, as well as any applicable rules and regulations regarding that provision, against political committees that do not make contributions to, or coordinated expenditures on behalf of, candidates or political party committees as defined by 25 Pa. Stat. Ann. § 3241(b).

3. This order shall become effective immediately, and shall continue in effect until this Court issues a final judgment in this action or otherwise lifts the preliminary injunction.

Dated: _____, ____, 2014

By _____
U.S. District Court Judge